
MASSACHUSETTS ELECTRIC COMPANY
NANTUCKET ELECTRIC COMPANY

D.T.E. 03-88E

SECOND SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY TO
MASSACHUSETTS ELECTRIC COMPANY AND
NANTUCKET ELECTRIC COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Massachusetts Electric Company and Nantucket Electric Company (together, “MECo” or “Company”) the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning

documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and with all parties; also submit two (2) copies of the responses to John J. Geary, Hearing Officer, one (1) copy of the responses to Sean Hanley, Assistant Director, Rates and Revenue Requirements Division; one (1) copy of the responses to Stephen Crowley, Analyst, Rates and Revenue Requirements Division; and one (1) copy of the responses to Barry Perlmutter, Analyst, Electric Power Division.
8. All non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.

INFORMATION REQUESTS

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| DTE 2-1 | Please refer to Exh. MJH-1. Provide all calculations and workpapers that support the estimates of costs associated with wholesale procurement of default service. Also provide a description of the work involved to complete each referenced task. |
| DTE 2-2 | Please refer to Exh. TMB-2. Provide all calculations and workpapers that support the numbers presented in this exhibit. Provide a description of the tasks performed under each section. |
| DTE 2-3 | Please refer to Exh. MJH-2. Provide all calculations and workpapers that support these estimates of costs associated with environmental disclosure labels. Provide a description of the work involved to complete each task. |

- DTE 2-4 Please refer to Exh. MJH-3. Provide all calculations and workpapers that support these estimates of costs associated with Massachusetts renewable portfolio standard. Provide a description of the work involved to complete each task.
- DTE 2-5 Please refer to the direct testimony of Mr. Hager at 9, lines 4 -7. Provide a copy of the provision that establishes the allocation of GIS costs to default service suppliers since March 1, 2003. Also explain what changes would need to occur in the future in order for GIS costs to then be considered the responsibility of the Company and not the supplier.